## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS SHERMAN DIVISION

DAVID E. MACK,

Plaintiff,

CAUSE NO. 4:15CV679

-against-

GC SERVICES LIMITED PARTNERSHIP,

Defendant.

TRIAL BY JURY DEMANDED

# DEFENDANT GC SERVICES LIMITED PARTNERSHIP'S ORIGINAL ANSWER & JURY DEMAND

GC Services Limited Partnership ("GC Services"), named as defendant in the abovestyled and numbered cause, and in response to the allegations contained in Plaintiff's Complaint, respectfully shows this Court as follows:

#### **ANSWER**

- 1. As provided by Rule 8 of the Federal Rules of Civil Procedure, all allegations not expressly admitted herein are denied.
- 2. GC Services admits the factual allegations in Paragraph 1 that this Court has jurisdiction under 47 U.S.C. § 227(b)(3) and 28 U.S.C. §1331.
- 3. GC Services admits the factual allegation in Paragraph 4 that GC Services' offices are located at 6330 Gulfton Street, Houston, Texas 77081, but GC Services otherwise denies the allegations Paragraph 4.
- 4. GC Services admits the factual allegation in Paragraph 6 that venue is proper in this Court.

- 5. GC Services denies the factual allegations in Paragraphs 2, 7–12, 14–20, 22, and 24.
- 6. GC Services lacks sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraphs 3, 5, 13, and 21.
  - 7. Paragraph 23 contains no factual allegations for GC Services to admit or deny.

#### **JURY TRIAL DEMANDED**

In accordance with Federal Rule of Civil Procedure 38, GC Services Limited Partnership demands a trial by jury on all issues.

#### **PRAYER**

WHEREFORE, PREMISES CONSIDERED, Defendant GC Services Limited Partnership prays as Plaintiff take nothing by his claims; Defendant be awarded its costs; and Defendant be awarded such other and future relief as the Court may deem just and proper.

Respectfully submitted,

/s/ William S. Helfand
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Attorney in Charge Defendant

### OF COUNSEL:

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# **CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing has been forwarded to the following counsel of record in accordance with the local rules on this 27th day of October, 2015, to:

David Mack 7720 McCallum Blvd. #2099 Dallas, Texas 75252

/s/ William S. Helfand

William S. Helfand

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